



U.S. District Court for the Northern District of Georgia

Atlanta Division

LARRY LAMONT LEDFORD

PLAINTIFF

v.

TYLER PERRY STUDIO'S

DEFENDANT

CHRISTIAN KEYES

DEFENDENT

LAW OFFICE OF DAYNA THOMAS COOK, ESQ LLC

DEFENDANT

1:23-cv-5472

[VIOLATION COMPLAINT]

TITLE 17 U.S.C. 501(a) CIVIL COPYRIGHT INFRINGEMENT

JURISDICTION AND VENUE

This court has jurisdiction over the subject matter and parties pursuant to 28 U.S.C. Section 1331. As this case involves questions of federal law. This court also has jurisdictions pursuant to 28 U.S.C. section 1343 because Plaintiff- seeks damages for violations of his exclusive Copyrights pertaining to his fictional character of his story: "TRAPPN". Venue is proper in, and Defendants are subject to the personal jurisdictions of, this Court because Defendants maintain facilities and business operations in this District, and

all or. most of the events rise to this action occurred in this District. 28 U.S.C. Section 1391(b): 42 U.S.C. section 2000e-5 (f) (3)

### COMPLAINT

1. The bases of this complaint alleges that the above-named defendants have
2. engaged in a scheme to deprive the plaintiff of his exclusive rights of his entitled
3. work: "TRAPPN". Without his consent and permission has reproduced his work
4. and is now profiting from this illegal act of infringement. The allege work entitled:
5. All The Queens Men is a derivative work based off the book by Mr. Christian
6. Keyes entitled: "Ladies Night. The derivative was created on or about 2019-
7. 2020 and released on September 9, 2021. Plaintiff is alleging that the
8. derivative work of the defendants' fictional character of All The Queen Men
9. bares substantial similarity to his protected creative expression via his fictional
10. character that is depicted in his story TRAPPN.
11. Briefly, the plaintiff story was to be pitch as a franchised series that has a
12. two-part story line for potential spin off opportunities. One part is about four
13. coming to age teenagers who has gained national attention as rap artist.
14. Second part, and the central focus of the story centers around their childhood
15. friend who has started the largest gentlemen club in Atlanta, and the United
16. States. Operating her strip club called Black Pearl Entertainment, Tammy
17. "Mocha" Johnson is considered to be the most feared woman in the
18. entertainment industry. She is protected by her female chief of security Bridget,
19. who is trained in all fire arms, as well as martial arts. She is constantly by
20. Tammy Johnson side 24/7.
21. In the defendants' derivative work All The Queens Men, we'll discover that

22. the story main fictional character Marilyn Madam Deville aka Madam, played  
23. by actress and model Eva Marcille. Who runs and operates the largest strip  
24. club in Atlanta, Ga called: "Club Eden" she is considered to a boss of boss and  
25. very dangerous. She is protected by her female chief of security Blue, who is  
26. constantly by her side. Setting in Atlanta, Shooting location large strip club,  
27. character similarity. The story is identical and is substantially similarity in  
28. concept and feel. See Roth Greeting Cards v. United Cards. 429 f2d 1106(9<sup>th</sup>  
29. Cir. 1970).

30. In defendant Christian Keyes book "Ladies Night". The main fictional  
432. prison. He soon finds work at a night club located in Englewood, California  
called

33. Eden, ran by a character by the name of Mary Fox. This book was completed in  
34. 2013-214, again Atlanta was not mention as a setting or location very critical  
35. as it relates to this infringement lawsuit. The absence of one of the main  
36. characters that protects Madam was not in his book of Ladies Night female  
chief

37. of security Blue. Giving the impression that my work was copied and then  
38. altered to make their series.

39. This proves substantial similarity in my prima face case, plaintiff is owner of  
40. the copyrights and has therefore pursued his constitutional right to file  
41. this lawsuit in Federal Court.

#### STATEMENT OF CLAIM

#### FEDERAL RULE OF CIVIL PROCEDURE 8 (A)

DEFENDANT STATEMENT OF CLAIM - Law Office of Dayna Thomas LLC office presides on 1100 Peachtree St. NE Suite 250, Atlanta, Georgia 30309. Where she practices in the field of Entertainment and Trademark law. On or about November 7, 2018 plaintiff contacted entertainment law firm Dayna Thomas Cook, LLC office spoke to her via a 30 minute phone consultation, and told her I was looking for help to get my original story out for production consideration. She

advised me before she commits to any projects she must review the material and therefore instructed me to forward them via email; she gave me her word that it would be confidential. So, I followed her instructions and respectfully emailed them to her office. I waited one week and then I began to follow up with her. On November 13, 2018 I emailed Ms. Thomas regarding the requested material I'd sent her, she told me: "She haven't had any time to review them". Two months went by and never heard from her since.

It is now early 2020 when Tyler Perry Studio's was about to release a new television series entitled: "All The Queens Men". I then read their synopsis and knew that Defendant Law Office of Dayna Thomas had leaked my confidential material I'd submitted. The elements where there as well as my protected creative expression thus provoking an infringement.

Plaintiff is claiming that according to the defendants bio she has a working business relationship with B.E.T. that streams the infringing derivative work "All The Queens Men", used her position as an Entertainment lawyer to gain access to Tyler Perry Studios who also has a 25 percent stake with this streaming company and allegedly submitted my confidential material.

As a result of this unauthorized leak Tyler Perry Studio's in 2019 begins the infringement, development as well as the production of the derivative work All The Queens Men, shortly thereafter, plaintiff had submitted his television series project to Defendant Law office of Dayna Thomas Cook LLC. Thus triggering a cause of action under title 17 U.S. Code 501 (a) Copyrights Act of 1976, also violating title 17 U.S. Code 106 under exclusive rights statutes. When an infringer- infringes of the rights of a copyright holder relief can be sought in a court of law. She ignored plaintiff's copyright notices that were affixed to the material that was submitted to her. As well as disregarding her confidentiality promise to a perspective client.

Without the express written permission of the plaintiff, Dayna Thomas allegedly and unlawfully leaked my material through a third party, that being Tyler Perry Studio's. On September 9, 2021 BET-Plus began to stream the derivative All The Queens Men, thus infringing on plaintiff copyrighted work: "TRAPPN". Base off her conduct the plaintiff has suffered irreparable, mental, economic damage, as well as hardship. Plaintiff has elected for relief under Title 17 US Code 504 (c) Statutory Damages as well as punitive damages at the court discretion. Since this was a blatant disregard of the plaintiff's exclusive right, he is seeking the maximum relief regarding statutory damages. I believe that the facts stated in these particular of claims are true sufficient.

**DEFENDANT STATEMENT OF CLAIM**- Tyler Perry Studio presides on One Tyler Perry Studio's Way, Atlanta, GA 30310. Tyler Perry Studio's is a licensed Corporation for profit. This corporation produces, develops content for television via streaming platforms. As mentioned in the above statement of claim regarding the Law Office of Dayna Thomas LLC. Defendant Tyler Perry was allegedly given plaintiff's confidential material and allegedly began without the authorization by the plaintiff to reproduce, develop and distribute plaintiff's protected creative expression via streaming.

Plaintiff is claiming after the allege leak of his television series TRAPPN, in 2019 is the year Tyler Perry Studios began the infringement, development, production of All The Queens Men. After the purported miss appropriated manipulation of the plaintiff's literary work, it is when they created an derivative work All The Queens Men. After the completion defendant Tyler Perry Studios registered the infringing work June of 2020. Plaintiff is claiming All The Queens Men was created in 2019, copy written in 2020. Plaintiff work received his copyrights in October, 2018 once plaintiff received his copyrights it was the following month that he reached out to Defendant Law office of Dayna Thomas LLC.

Tyler Perry Studios are reaping financial benefits by distributing the infringing work to multiple streaming platforms thus far 48 copies has been distributed to 8 streaming platforms making it a total of 384 copies. Without the express written permission of the copyright holder Larry Lamont Ledford, Tyler Perry Studios under title 17U.S Code 501 (a) has knowingly, and willfully committed copyright infringement, and violating title 17 U.S Code 106 under exclusive rights statutes.

Defendant Tyler Perry Studios also ignored the copyright notices that were affixed to the allege leaked material, and allegedly replaced it with a new one under All The Queens Men for copyright registration.

Tyler Perry Studios has inflicted irreparable, mental, and economic harm to the plaintiff as well as to his family. As such plaintiff is entitled for relief in the form of statutory damages under title 17 U.S. Code 504 for remedies. Plaintiff has elected for maximum statutory damages since this was a willful act for all copies that were submitted to the various streaming platforms. Lastly, plaintiff is asking the court for further sanctions including but not limited to punitive damages and injunction relief as a whole. Relief sought for injunction is to order defendant to halt the continue production of the television series until such remedies has been settled. I believe that the facts stated in these particular of claims are true and sufficient.

**DEFENDANT STATEMENT OF CLAIM- CHRISTIAN KEYES**, Defendant Christian Keyes has no listed physical address. He is an American Actor, and writer and author of Ladies Night, place of employment currently is Tyler Perry Studios. Plaintiff is claiming that once Tyler Perry Studios allegedly received the leaked material from Defendant Law office of Dayna Thomas LLC. Tyler Perry Studios allegedly used defendant Christian Keyes novel Ladies Night which was published in 2014, to conceal the infringement by creating a derivative All The Queens Men, and illegally used plaintiff protected creative expression as their derivative work, a derivative work that quite frankly was created in the year 2019 five years after the publication of Keyes novel, and registered it for copyright June, 2020.

**Copy Right Protection of Derivative works under the Copyrights Act of 1976.** There are two ways that derivative rights are protected under copyright law. First, the derivative work has protection under copyright of original work. Copyright protection for the owner of the original copyright of the original work. Copyright protection for the owner of the original copyright extends to derivative works.

This means that the copyright owner of the original work also owns the rights to derivative works. Therefore, the owner of the copyright the original work may bring a copyright infringement lawsuit against someone who creates a derivative without permission.

Second, the derivative work itself has copyright protection. The creator of the derivative work owns the copyright to the derivative work. This can either be the creator of the original work, or someone else who has obtain a derivative work license the holder of the original copyright.

The copyright of a derivative work is separate from the copyright to the original work. Therefore, if the copyright holder gives someone a license to create a derivative work, the holder retains the copyright to the original work. In other words, only the derivative rights are being licensed.

Defendant Christian Keyes, Tyler Perry Studios, and The Law office of Dayna Thomas Cook, did not seek out the express written permission to begin altering, and producing the derivative work All The Queens Men it was a Nefarious act to say the least.

Defendant Christian Keyes, has been promoting this derivative work All The Queens men, and is claiming that he is the sole creator of this literary work. What he is doing is making false representation and is misleading audiences through social media, and blogs. By admitting he is the creator of this work he is complicit and; he also is therefore liable for the lawsuit that has been issued. By his conduct

Defendant Christian Keyes has done irreparable, economic, and mental damages to the plaintiff as well as to his family relief is sought in the following.

By violating title 17 U.S. Code 501(a) Copyright infringement statutes, and title 17 U.S. Code 106 via exclusive rights. Relief can be sought and should be granted under title 17 U.S. Code 504 for statutory damages or profits. Plaintiff has elected to ask the court for relief for the maximum statutory damages as well as punitive damages at the discretion of the court, for willful intent and neglecting the plaintiff's copyright notice that were affix to his leaked television series TRAPPN. Also defendant Christian Keyes also ignored the copyright notices that were affixed to the leaked material, and replaced it with a new one under All The Queens Men.

As mentioned above statement of claim, total copies created are 48 and they were distributed to 8 streaming platforms making a total of 384 copies under title 17 U.S. Code 504 statutory damages if the infringement was willful the court can at its discretion order relief at 150.000.00 per infringed work. I believe that the facts stated in these particular of claims are true and sufficient.

#### STATEMENT OF FACTS

61. In the month of March the named defendant of Tyler Perry
62. Studio's will launch their new television series entitled: "All The Queens Men" in
63. the summer of 2021, that is set in Atlanta based on a book by Christian Keyes
64. entitled: "Ladies Night Out". We will analyze Mr. Keyes book in scope
65. beginning with his registration to the copyright office. On December 1, 2014,
66. Mr. Keyes made a registration to the copyright office for his book: "Ladies
67. Night" a 229 page book with the registration TX000799822/ 2014-12-19.
68. Making Mr. Keyes book the focus of this Copyright claim, the plaintiff isn't
69. disputing the author's claim of his book; he is however, challenging his validity on

70. his claim of creatorship regarding their television series: " All the queens' men".  
71. In their own words, the defendants are claiming that their story is based on Mr.  
72. Keyes book, stating that the story setting is in Atlanta. The setting plays a very  
73. important factor in the overall marketability of the movies. In my story Atlanta,  
74. not only is the main setting but it is also where my fictional character Tammy  
75. Johnson was born and raised. Very critical part of the story creative expression  
76. that is used throughout the plaintiff's story as it relates to the dialect, dialogue  
77. and the highly popular entertainment culture in Atlanta. In chapter 1 page 1,  
78. fourth paragraph we see that the main character of Ladies Night name Amp is  
79. seen looking out of the rear-view mirror in a vehicle; he notices the sign that 80.  
80. reads: "California Penitentiary". In chapter 8 first paragraph line six, you'll  
81. discover that the main character was raised in Long Beach, California. After  
82. losing his job at a convenience store, he soon meets a beautiful woman named:  
83. "Mary Madam" Fox the owner of a California Night club called "Club Eden"  
84. where she hosts an after-hour event called: " Ladies Night" which show cases  
85. male strippers. Amp enjoys the money that is being made and decides to join  
86. her male review on Ladies Night as a stripper This contradicts the defendants  
87. claim that their television setting of being in Atlanta, which shows in actuality 88.  
88. that the story setting and content is in fact Los Angeles, California as well as  
89. the location of Mary Madam Fox night Club Eden. Now let us analyze Mary  
90. Madam Fox. In Chapter 9pg 75 beginning at the second paragraph. Amp  
91. had been told by one of the gossiping bartenders. Three years earlier, she was  
92. managing the hottest nightclub in town. She booked talent, celebrity hosts, and  
93. even came up with the idea to bring in male dancers to put on show after  
94. regular club hours. It became known as the infamous Ladies Night. Chapter 9  
95. pg. 76 paragraph four. Eventually, Madam got fed up and quit the, club

96. convincing the dancers to follow her. Unfortunately, she no longer had a roof  
97. for them to perform under, she took every dime she had and bought the  
98. building that was the home of Club Eden. In this chapter, the Author does not  
99. describe Club Eden as a Strip club; (A) He describes it as a nightclub. (B) He  
100. does not describe her as a strip club owner, but a nightclub owner. Very  
101. critical as it relates to the plaintiff copyright infringement case. NOTE: There  
102. are no second editions nor revisions in the Authors work for seven years.

#### What Are Derivative Works?

103. For an official legal definition of derivative works, the United States  
104. Copyright Act of 1976, Title 17 U.S.C. Section 101 states: A "derivative work"  
105. is a work based upon one or more preexisting works, such as a translation,  
106. musical arrangement, dramatization, fictionalization, motion picture version,  
107. sound recording, art reproduction, abridgment, condensation, or any other form  
108. in which a work recast, transformed, or adapted. A work consisting of editorial  
109. revisions, annotations, elaborations, or other modification which, as whole  
110. represents an original authorship, is a "derivative work" "However, there have  
111. been numerous court cases interpreting the law, which complicate things and  
112. render this definition incomplete. There must be major or substantial new  
113. material for a work to be copyrightable as a derivative work. The new material  
114. must be sufficiently original and creative to be copyrightable itself. Common  
115. examples of derivative works are: A new updated or revised, edition of a book  
116. A novel adapted to a screenplay, stage play production, or motion picture

#### Copyright Protection of Derivative Works

117. First, the derivative work has the protection under the copyright of the  
118. original work. Copyright protection for the owner of the original copyright

119. extends to derivative works. This means that the copyright owner of the  
120. original work also owns the rights to the derivative works. Therefore, the  
121. owner of the copyright may bring a copyright infringement lawsuit to who  
122. created a derivative work without permission.

Plaintiff create his work

123. In the year of our Lord 2016 the plaintiff completed his work entitled: "Trappn" and on October 27, 2018 received his certificate of copyrights. Registration number TXu002121948. Trappn is a two-part Hip-hop television story that are 1-hour episodes. It was to be pitch as a new television franchise for streaming and or regular television programming. In story two, the plaintiff chronicles the story of fictional character Tammy Johnson aka Mocha, an African American female that runs the largest gentlemen club in Atlanta called "Black Pearl" Her corporation is called Black Pearl Entertainment. She is known as the most influential woman in the industry and known as the boss of all bosses. Beautiful and direct woman, that is very dangerous. Upon sending two full episodes, cast of characters and a copy of my story synopsis to Defendant Dayna Thomas in early November of 2018 for a potential network with her, she failed to respond back to me and gave me her word in good faith it would be confidential. Never heard from her. Fictional character can be protected separately from their undying works as derivative copyrights, provided that they are sufficiently unique and distinctive. Fictional character under U.S. Law can be protected from their underlying works...subsection 106 of the Copyright Act of 1976.

Story Being Told Test

146. If the fictional character is central to the story then it will be copyrightable. In the case of "Universal City Studio v. Kamar Industries" this test was applied to

148. hold that E.T. was a distinctive character around whom the story in the movie  
149. E.T. the Extra Terrestrial revolved. Therefore, the copyright of E.T. was held to  
150. enjoyed by Universal Studios, and the defendants were held liable for  
151. violating the plaintiff's copyrights by manufacturing and sale of goods. In the  
152. plaintiffs work "Trappn" the fictional character Tammy "Mocha" Johnson has  
153. met her threshold as a copyrightable character, she is very distinctive,  
154. charismatic and is the critical key of moving this story. Without her character  
155. the story will fall flat on its wayside, same can be about the character in "All  
156. The Queens Men Mary Madam Fox". NOTE: 2020 Christian Keyes  
157. secondary character Mary Madam Fox a California nightclub owner is now  
158. the main character in their revision as a strip club owner who now operates an  
159. upscale strip club called Club Eden in Atlanta. Described as very savvy and  
160. Influential. The defendants allegedly switched plaintiff fictional character  
161. Tammy Johnson with Mary Madam Fox, and their nightclubs to get their story.  
163. Thus, provoking a civil copyright infringement violation as outlined in the  
164. Copyrights act of 1976.

COUNT 1

CIVIL COPYRIGHT INFRINGEMENT

(Title 17 USC Section 501 (a) 106-122 Infringement of  
Copyrights)

165. Plaintiff is alleging that the defendant has through a scheme attempted to  
166. steal the exclusive rights of a protected work that received its copyright of  
167. registration in October of 2018 as stated in, and 70 of this complaint.  
168. In doing, the defendants allegedly taken the plaintiffs protected  
169. fictional character "Tammy Johnson and used it as their derivative work that is

170. outline on line 101 of the complaint. In case in a legal question, what  
171. constitutes copyright infringement, and how can it be proven? In a copyright  
172. infringement lawsuit, a plaintiff must show (a) Access (b) Certificate of  
173. copyrights from the copyright office, and lastly (c) Substantial Similarity. The  
174. In the United States 9<sup>th</sup> circuit in the case: "Sid & Kroft Marty Television Production  
175. Inc. v. McDonald Corp." & Roth Greeting Cards v. United States Card Co (1970).  
176. The ninth Circuit heard these 179. copyright perspective infringement cases.  
177. Infringement test are conducted, but the most effective test that the 9<sup>th</sup>  
178. circuit implemented with regards to potential appeals, are in scope: "The  
179. Extrinsic & Intrinsic Test" 18to determine substantial similarity in a  
180.c copyright infringement lawsuit. To prove substantial similarity in my  
181. pleading I will use the: "Extrinsic and Intrinsic test to show how the  
182. defendants violated the exclusive rights of the plaintiff's work.

#### SUBSTANTIAL SIMILARITY TEST

##### Extrinsic & Intrinsic or Concept and feel test

183. In a proper pleading as it relates to extrinsic & intrinsic test for substantial  
184. similarity, the US 9<sup>th</sup> circuit in the case "Roth Greeting Cards v. United States  
185. Card Co 429F.2<sup>d</sup> 1106 (1970). The United States Court of Appeals for the  
186. Ninth Circuit disagreed with the district on the subject of jurisdiction. Roth had  
187. initiated filing for copyright well before the case was filed, and although  
188. there had been delays in completing the process that was not relevant. The  
1891. court agreed that the words could not be protected since they were to  
190. ordinary. However, it noted that the combination characters portrayed, the  
191. message, the mood and the layout were very similar. The "total concept  
and  
192. feel" were the same. The court that an ordinary person comparing the pairs  
193. of cards would consider that one was a copy of the other. Although it is

194. always difficult to prove copying, United had admitted access. On this basis,  
195. copyright had been infringed. The court remanded the case back to the district  
196. court for further proceedings based on this decision. One of the judges  
197. dissented from this opinion, feeling that if there was no infringement of either  
198. the words or the artwork taken separately, there was no infringement. The  
199. case became a standard example of a case where copyright infringement  
200. had been found based on evidence of access to the original work and  
201. substantial similarity in "in total concept and feel" of the two works. Later  
202. courts followed the decision in this case. See v. Durang (1983) cited the case in  
203. defending the practice when comparing two plays "as a whole" in looking for  
204. substantial similarity. The court in Hamil America v, Inc v. GFI (1999) rejected  
205. "the broad proposition that 'in comparing designs for copyright infringement,  
206. we are required to dissect them into their separate components, and compare  
207. only those elements which are in themselves copyrightable.' "The court in the  
208. case of Sid & Marty Kroft Television Production Inc. v. McDonald's Corp.  
209. (1997) refined the concept by establishing a two-stage comparison. A  
210. extrinsic test would determine similarity of general ideas, while an intrinsic test  
211. would compare the particular expressions used. The second tests should be by  
212. an "ordinary reasonable person" rather than an expert. I will use the extrinsic  
213. & intrinsic test as well as a proper dissection of both works to show in fact that  
214. infringement has occurred.

Extrinsic Test

General Ideas

215. In the plaintiff two-part story his protected fictional character "Tammy  
216. Johnson African American female who runs the largest strip club in Atlanta,  
217. and the United States her gentlemen club is called: 'Black Pearl". And based  
218. off Ladies Night written by defendant Christian Keyes, along with  
219. codefendant Emmet Perry Jr and Tyler Perry Studio produced their version in:  
220. "All The Queens Men" about an African woman who runs a premier strip club  
221. in Atlanta. I would like to present Exhibit 1 The front cover of the defendant  
222. Christian Keyes book entitled: "Ladies Night". You'll see in his description  
223. box the main character is born and raised in California not Atlanta, Georgia  
224. as is my fictional character Tammy Johnson. As part of the dissection of these  
225. works we'll start with the two main and copyrightable fictional characters  
226. Tammy Mocha Johnson who owns and operates the largest strip Atlanta called  
227. "Black Pearl" of the plaintiff's work, "Trappn" and All The Queens Men .  
228. fictional character Marilyn Madam Deville, who owns and operates a large  
upscale  
229. strip club in Atlanta, as well as the country. In this *prima facie* I will eliminate  
230. both characters as well as both clubs, and give the description of the  
231. characters motivations. A young beautiful African American female owns and  
232. operate the largest and upscale strip club in Atlanta, as well as the country.  
233. She is considered a boss, savvy, charismatic, and the most fear business person  
234. in the entertainment industry. In this *extrinsic* test, the general ideas show  
235. substantial similarity. Similarity is very prevalent. These two critical characters  
236. moves the story. Now I will introduce uncopyrightable elements of the both  
237. stories. Plaintiff alleges that the defendant has removed his fictional  
238. character Tammy Johnson, as well as his fictional strip club Black Pearl  
239. Gentlemen club, substituted their character Marilyn Madam DeVille as well as  
240. altering their setting, Club Eden in All The Queens Men.

Intrinsic Test

Expression of the Idea

241. The creative expression of the idea that is displayed in the plaintiff's story

242. Trappn as it relates to his fictional character Tammy Johnson: "it's how she runs

243. and operate her gentlemen club, and how the dancer performs their

244. respective routines throughout the story." As well as her unpredictability as a

245. whole.

Uncopyrightable Elements

246. Cast of character: All Queens Men. Raquel Palmer as "Blue" Madam's

247. female chief of security. Blue is frequently seen at Madam's side when things

248. get a little dicey. Cast of character of plaintiff's work: "Trappn". Bridget-

249. Tammy Johnson female head of security, incredibly beautiful, trained martial

250. arts specialist former army ranger. A kick ass and ask question later. You will

251. find her on plaintiff's attached manuscript entitled: "Street Team" Episode V

252. pg.22 respectfully. Again, very evident of manipulation and literary theft.

253. Not only does the extrinsic test shows substantial similarity in the main

254. characters, there is also substantial similarity in the uncopyrightable elements

255. as well. In the intrinsic test it also shows the substantial similarities in the

256. creative expression that is used in both stories. Can an ordinary eye

257. determine that this story is about a young African American female who runs a

258. gentlemen club in Atlanta? It shows that she is in control, it shows various  
259. scenes of Atlanta and it shows that this is a high-powered entertainment  
260. television series. This is the Concept and Feel Test, their derivative work version  
261. of All The Queens wasn't about his book, it showed that the story was based in  
262. part about a convict from California, totally different from the story All The  
263. Queens Men. A young African American lady that runs an upscale strip club in  
264. Atlanta. Evidence shows that the defendants made a registration to the  
265. copyrights office for Ladies Night (All The Queens Men) in 2020 of last year.  
266. All The Queens Men shows up as a short form book. The defendant's synopsis  
267. clearly states that All The Queens Men is solely based on the book Ladies  
268. Night by Keyes. Based meaning of a preexisting work thus, making this a  
269. derivative work according to copyright laws. However, the defendants did  
270. not list it as a derivative work this makes it a controversy and why? It doesn't  
271. fit the criteria for copyright as mentioned on line 111-116 of this pleading.  
"There  
272. must be major or substantial new material for a work to be copyrightable as  
273. a derivative work. The new material must be sufficiently original and creative  
274. to be copyrightable itself". By this standard the defendants work "All The  
275. Queens Men was not only an illegal entry it is a uncopyrightable work, thus  
276. making this work ineligible to hold copyright protection. The plaintiff clearly  
276. has proven copyright infringement by statutes and case laws. If copyright  
277. infringement has been proven, then the following violations have been  
278. committed as a whole.

Tyler Perry Studios makes electronic entries for copyrights

279. the Defendants Christian Keyes, and Tyler Perry Studios had made two  
280. electronic entries to the copyright office. Ladies Night (All the Queens Men)  
281. Creation date 2016 TXu002201069/2020-05-29 electronically filed.  
282. Second electronically filed entry to the copyright office. Document Number  
283. V9974d271 Date of recordation 2020-09-22 date of execution June 2 2020  
284. Title: Ladies Night; Book  
285. Note: Form Option schedule1 recorded at request of sender  
286. Party 1: Christian Keyes/Defendant  
287. Party 2: Tyler Perry Studios Development. LLC/Defendant  
288. Upon these electronic entries all exclusive rights were transferred to Tyler  
289. Perry Studio's, thus giving him exclusive rights which in fact was illegal.  
290. All entries were made shortly thereafter plaintiff submitted his copy written  
291. work to defendant Ms. Dayna Thomas. This is where the plaintiff is alleging a  
292. scheme by the defendants to conceal infringement and violate the plaintiff's  
293. exclusive copyright. Plaintiff has established his copyright as well as his  
294. original content and creative expression way a head of the defendants. Thus  
295. provoking the next claim.  
369. told him it would be an honor sir. However, to continue his monopoly he must  
370. not allow any potential competition stand in his way it would be a direct  
371. threat to his empire. That being said, it was done for commercial & personal  
372. gain. Thus, causing irreparable and economic damage, to the point my movie  
373. cannot be made. Signature. Under Penalty and Perjury under the law and  
374. court provision, I attest to the court that what his written in this pleading is true  
375. and accurate to the best of my abilities.

*Larry Lamont Ledford*

11/30/2023

**Larry Lamont Ledford**

**3335 Ridge Hill Pkwy**

**Douglasville, Georgia 30135**

**404-409-7912**

**Email: [Ledfordlarry73@gmail.com](mailto:Ledfordlarry73@gmail.com)**

TO:

Register of Copyrights  
 U.S. Copyright Office  
 101 Independence Ave. S.E.  
 Washington, D.C. 20559-6000

REPORT ON THE  
 FILING OR DETERMINATION OF AN  
 ACTION OR APPEAL  
 REGARDING A COPYRIGHT

In compliance with the provisions of 17 U.S.C. 508, you are hereby advised that a court action or appeal has been filed on the following copyright(s):

<input checked="" type="checkbox"/> ACTION <input type="checkbox"/> APPEAL		COURT NAME AND LOCATION UNITED DISTRICT COURT OF NORTHERN GEORGIA ATLANTA DIVISION	
DOCKET NO.	DATE FILED		
PLAINTIFF LARRY LAMONT LEDFORD		DEFENDANT TYLER PERY STUDIO'S LAW OFFICE OF DAYNA THOMAS LLC CHRISTIAN KEYES	
COPYRIGHT REGISTRATION NO.	TITLE OF WORK		AUTHOR OR WORK
1 TX000121948	"TRAPPN"		LARRY LAMONT LEDFORD
2			
3			
4			
5			

In the above-entitled case, the following copyright(s) have been included:

DATE INCLUDED	INCLUDED BY <input type="checkbox"/> Amendment <input type="checkbox"/> Answer <input type="checkbox"/> Cross Bill <input type="checkbox"/> Other Pleading	
COPYRIGHT REGISTRATION NO.	TITLE OF WORK	AUTHOR OF WORK
1		
2		
3		

In the above-entitled case, a final decision was rendered on the date entered below. A copy of the order or judgment together with the written opinion, if any, of the court is attached.

COPY ATTACHED <input type="checkbox"/> Order <input type="checkbox"/> Judgment	WRITTEN OPINION ATTACHED <input type="checkbox"/> Yes <input type="checkbox"/> No	DATE RENDERED
CLERK	(BY) DEPUTY CLERK	DATE

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